in said scribble, said first point not equal to said second point and said first point not equal to said ~~important point~~ <u>spline knot</u> and said second point not equal to said ~~important point~~ <u>spline knot, and said spline not being a portion of the circumference of a circle,</u> in which said computer system:

    a. finds a third point on the scribble between said first point and said second point, such that the distance between said third point and a postulated line extending through said first point and said second point is equal to or greater than the distance between said postulated line and any other point between said first point and said second point;

    b. identifies said third point as ~~an important point~~ <u>a spline knot</u> if the distance between said third point and said postulated line meets predetermined criteria.

REMARKS:

The Examiner rejected claims 2, 3, 4, and 5 under 35 U.S.C. § 102(b) as being anticipated by Takasaki U.S. Patent No. 4,969,201 ("Takasaki").

I. CLAIM 2, AS AMENDED, AND CLAIM 5, AS AMENDED, ARE NOT ANTICIPATED BY TAKASAKI.

Takasaki describes "polygonal-line processing" of dot-line image data. Takasaki 4:14. This process identifies what Takasaki calls "image structuring points." Takasaki 4:31-32. Takasaki describes a process that determines whether a given "image structuring point[]" is a "polygonal-line structuring point." Takasaki 4:45. After

identification of polygonal-line structuring points, Takasaki describes a process that determines whether three adjacent polygonal-line structuring points are determined to be "arcuate or circular arc segments." Takasaki 6:10.

Takasaki does not describe a method for analyzing a scribble to determine spline knots. The phrase "arcuate or circular arc segment" is not defined in Takasaki, but is understood to refer to any portion (other than the entire curve) of the circumference of a circle. Figure 5 of Takasaki also shows an "arc" that is a portion of the circumference of a circle. By contrast, as disclosed in the application, "[s]plines are curves, which are usually required to be continuous and smooth. Splines are usually defined as piecewise polynomials of degree n with function values and first n-1 derivatives that agree at the points where they join. The abscissa values of the join points are called knots." Application 7:10-13. Not all splines are circles.

Accordingly, Takasaki does not disclose a method for determining a method of identifying a spline knot in a scribble. The Application discloses such a method: it defines "important points" to include spline knots. Therefore, Claim 2 (as amended), Claim 5 (as amended), and Claim 3 (dependent on the amended Claim 2) are not anticipated by Takasaki and a rejection of those claims under 35 U.S.C. § 102(b) would be improper.

II. CLAIM 4 IS NOT ANTICIPATED BY TAKASAKI.

The Examiner rejected Claim 4 giving as explanation "please refer back to claim

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2 for further explanation." Claim 4 is independent of Claim 2. Claim 4 claims a "method of determining whether a set of points in a scribble . . . resembles either a curve or a line segment," in which the "statistical distribution" of "the distance of at least two points . . . from a postulated line" is analyzed to see if it "meets predetermined criteria." The specification illustrates one possible statistical analysis at 14:11 to 15:24.

Takasaki does not describe a statistical analysis to determine whether a set of points in a scribble between two points resembles either a curve or a line segment. Takasaki describes a method of determining whether three adjacent structuring points line on an "arcuate or circular arc segment[]." Takasaki 6:10. Takasaki describes that method as postulating a circle passing through the three structuring points, and measuring the distance between that circle and the midpoints on postulated line segments connecting the three structuring points. *See* Takasaki 5:60-6:35. Takasaki expressly states that the invention described does not use "statistical processing." Takasaki 6:62-63.

Accordingly, Takasaki does not disclose a method of determining whether a set of points in a scribble resembles either a curve or a line segment through the use of statistical analysis. Therefore, Claim 4 is not anticipated by Takasaki and a rejection of that claim under 35 U.S.C. § 102(b) would be improper.

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III. CHANGES TO THE SPECIFICATION

All requested changes to the specification are made for the purpose of

correcting typographical errors, and do not substantively change the specification.

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By: _____

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